Project Reference Numbers: EN 010077 and 010078

IP Numbers: 20023188 and 20023189

Date: 2 June 2021

Dear Examining Authority,

## Deadline 11 Submission

Once again, thank you for your continued care and thoroughness over this project, and your willingness to listen to and take account of the views of the many parties involved.

I listened to ISH16 and 17 last week, and as a result I feel I must write to you again. A number of issues were raised which highlighted serious differences between the different parties involved. This suggests, when taken alongside some responses at other ISHs, that there are issues with the onshore proposal which could make it difficult for this aspect to be consented.

Points that I particularly noted were:

## 1. National Grid and general planning matters

- The unwillingness of National Grid to attend the hearing or to answer questions, saying that the Applicant must speak for them.
- The unwillingness of the Applicant to speak for the National Grid, (perhaps suggesting lack of detailed knowledge by the Applicant of the National Grid's plans)
- The lack of clarity as to why the National Grid substation appears to contain elements such as sealing-end compounds, apparently not related to this project.
- The Applicant's refusal to get an independent design review even though other similar projects do have one.
- The Applicant's unwillingness to adjust to the changing Government views on energy transmission.
- The design difficulty of 'blending into' an environment at Friston in which there are no industrial buildings, and for a situation where it is not clear whether both proposals are intended to be carried through.

## 2 Flooding and related items

- At ISH16 there seemed to be much confusion over this issue, with different members of the Applicant panel saying different things, often contradictory, and not presented with clarity.
- There seemed to be no consideration by the Applicant of possible flooding caused by the construction of the cable route, even though this would be a process of several years, particularly as we heard that this element had been mismanaged in EA1.
- Going back to the original site-selection and the RAG process, it appears that only river flooding (not relevant here) was considered: but not field run-off, which is far more relevant. Yet, as we know, water regularly runs down the track from the proposed site into Church Lane, then overtops the culvert that runs parallel with Church Path, thus flooding parts of Grove Road and Low Road. At one point in the meeting yesterday this fact appeared to be denied by the Applicant, thus causing more confusion.
- Now, as the enquiry nears its end, the requested 'infiltration tests' have not been completed, and we heard two completely differing views from members of the Applicant panel as to why figures were not available for some of those that had been done.
- Even the ground-water level had not been assessed.
- Although an indication was given to members as to what a SuDS actually looks like, there
  was considerable discussion as to whether it had a 'bund' or whether it had an 'engineered
  solution' which suggested a lack of research and/or agreement amongst the Applicant

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panel. The Applicant said the site footprint might have to expand again if more drainage is necessary, and there seemed to be a wide range of views from the Applicant and the Country and District Councils, on how an integrated approach could be achieved for this challenging issue. This, again, suggests inadequate consideration of the various elements of the proposal at site-selection stage.

## 3. Other points

- The subject of ISH16 was 'Proposed Substations Site' and I was expecting that there would be more consideration of the cumulative effects of the siting proposal on the village of Friston and the surrounding area (I have to say that the awful destruction by trenches and equipment of what was beautiful green farmland, and the increase in heavy vehicles in Grove Road does not bode well).
- It still seems that there is a total lack of clarity as to whether this proposal is designed to encourage other projects to use the same access point to the National Grid.
- While we heard that the Applicant will be submitting a further noise design report, this does seem rather late for such an important issue, leaving little time for a considered response.
- As well, I personally would ask that the light pollution, as well of course the effect on the community, the landscape, ecology, tourism and recreation would be revisited by the Panel, for the Friston site and for the landfall and cable route.
- An individual IP did raise, at ISH16, the question of an overall national strategy. While I know
  that those decisions are considered to be outside the scope of this enquiry, please
  remember that they do have a direct impact on the recommendation made by this enquiry.

Additionally, I would, please, like to remind the ExA that, put simply, this proposal involves

- Putting three substations in the middle of a greenfield site, in a non-industrial area, very close to a village and listed buildings, and obscuring an ancient right-of-way and view-point, when more suitable brownfield sites, or other technologies, are available.
- Digging massive trenches, possibly more than once, through the delicate landscape of the AONB and close to habitation.
- Building a landfall on crumbling cliffs in the middle of a beauty spot and tourist area.

The confusion and lack of clarity shown by the Applicants at these Hearings and others, demonstrates that they are trying to justify using a site which was poorly chosen and is actually simply not fit for purpose. This was confirmed at the outset by the inadequate and ill-informed 'presentations' made by SPR in the Village Hall, and is now also confirmed by the vast number of IPs who have raised objections to it, as well as the objections by our MP and by Suffolk County Council.

If the site were suitable, then any difficulties would have been ironed out by now, and the
panel wouldn't still be talking about basic issues like drainage and the size of the
substations, and how many of them.

In conclusion, I would like to endorse all the points made by SASES and SEAS in previous meetings and documents, and would ask that the ExA recommends a 'split decision' on this project, consenting the off-shore aspects but not the on-shore ones.

With many thanks for your consideration of this letter. Kind regards, Alan Bullard